

Tech-Etch Conflict Minerals Policy

As a responsible corporate citizen, Tech-Etch, Inc. supports ending the violence and human rights abuses associated with the mining of certain minerals. As part of that commitment, Tech-Etch seeks to source products, components, and materials only from companies that share our values around human rights, ethics, and environmental responsibility.

In August 2012, the U.S. Securities and Exchange Commission ("SEC") adopted final rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Conflict Minerals Rule"). Under these rules, publicly traded companies must annually report to the SEC whether the products they manufacture or contract to have manufactured contain "conflict minerals" originating from the Democratic Republic of the Congo (the "DRC") and adjoining countries (the "Conflict Region"). Revenue from the mining and transport of these conflict minerals is believed to be financing or benefiting groups responsible for human rights violations. "Conflict minerals" refers to tin, tantalum, tungsten, and gold, and any derivatives thereof, regardless of where they are sourced, processed, or sold.

Tech-Etch supports industry-wide efforts to identify, reduce, and ultimately eliminate the use of "conflict minerals" by working with suppliers who either source minerals from outside the Conflict Region or from mines and smelters which have been certified by an independent third party as "conflict free" if sourced within the Conflict Region. Tech-Etch is committed to complying with any applicable requirements under the Conflict Minerals Rule and has implemented a due-diligence process to meet its obligations under the legislation.

Tech-Etch expects each of its suppliers to establish their own conflict minerals policies, due diligence frameworks, and management systems to prevent conflict minerals originating from the Conflict Region from being included in the materials sold to Tech-Etch, unless it can establish that the minerals are "conflict free." In the event, Tech-Etch determines that a supplier has failed to develop and implement reasonable steps to comply with this Conflict Minerals Policy, Tech-Etch reserves the right to take appropriate actions, which may include discontinuing the business relationship with the supplier.



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